

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MAURICE HARRIS,
also known as "Drench" and "Lil Wet"

CASE NUMBER: 24 CR 35

FILED

1/19/2024

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about January 19, 2024, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant, MAURICE HARRIS, also known as "Drench" and "Lil Wet," violated:

Code Section

Title 18, United States Code, Section
922(o)

Offense Description

Knowing possession of a machinegun, as it is defined
in Title 26, United States Code, Section 5845(b)

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Derreon Mcelwee

DERREON MCELWEE

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: January 19, 2024

Gabriel A. Fuentes

Judge's signature

City and state: Chicago, Illinois

Gabriel A. Fuentes, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, Derreon McElwee, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since approximately March 2019.

2. As part of my duties as an FBI Special Agent, I investigate violations of the Gun Control Act of 1968, National Firearms Act of 1934, and other federal firearms statutes relating to the unlawful possession and trafficking of firearms. I have received training in the history of firearms laws and regulations, firearms criminal violations, interstate controls, firearms identification, and investigative call/social media analysis. I have attended training at the FBI Academy at Quantico, Virginia.

3. This affidavit is submitted in support of a criminal complaint alleging that MAURICE HARRIS has violated Title 18, United States Code, Section 922(o)(1). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HARRIS for knowing possession of a machinegun, as it is defined in Title 26, United States Code, Section 5845(b), I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish

probable cause to believe that the defendants committed the offenses alleged in the complaint.

4. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other law enforcement members and witnesses, physical surveillance, my review of audio and video recordings, as well as open source and law enforcement databases. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

I. SUMMARY OF PROBABLE CAUSE

5. In summary, as described below, on January 19, 2024 and during the execution of a federal search warrant on a residence located at 720 West 47th Street, Apartment 4D, Chicago, Illinois, 60609 (hereinafter the “47th Street Apartment”), law enforcement observed MAURICE HARRIS temporarily lean out of a window of the 47th Street Apartment with a firearm in his hand and then throw the same firearm onto the roof of the 47th Street Apartment. Law enforcement recovered the firearm, which was a loaded Glock pistol that was modified to convert the firearm from a semiautomatic weapon to an automatic weapon, causing the firearm to shoot more than one shot by a single function of the trigger.

II. FACTS SUPPORTING PROBABLE CAUSE

A. HARRIS

6. Below is a photograph of HARRIS from the Illinois Secretary of State’s Office.



B. HARRIS FIREARM WITH SWITCH

7. On or about January 16, 2024, law enforcement obtained a search warrant for the 47th Street Apartment. *See In the Matter of the Search of: The residence located at 720 West 47 Street, Apartment 4D, Chicago, Illinois, further described in Attachment A, Case No. 23 CR 644 (Chang, J.) (under seal).*

8. The 47th Street Apartment is in a multi-unit complex that is occupied by multiple residents.

9. On or about January 19, 2024, at approximately 6:00 a.m., law enforcement executed the search warrant on the 47th Street Apartment.

10. As agents began to execute the 47th Street Apartment search warrant, law enforcement officers on the street surrounding the building observed HARRIS lean and extend his body out of the window of the 47th Street Apartment. Law

enforcement then observed HARRIS throw a firearm upward toward the roof of the 47th Street Apartment.

6. The firearm was later recovered by law enforcement from the roof of the 47th Street Apartment at the location of the roof where law enforcement observed HARRIS throw the firearm. The firearm is depicted below as it was recovered:



11. Based on my training and experience, I know that a “Glock” is a brand of firearm.

12. Based on my training and experience, I know that an “auto sear” or “Glock switch” is a conversion device that can be installed at the rear of the firearm to convert a semiautomatic firearm into an automatic firearm, meaning that the

firearm can automatically shoot more than one shot by a single function of the trigger allowing the ammunition to shoot, or spray, from the firearm as a machinegun.

13. I have examined the firearm HARRIS possessed and threw on the roof of the 47th Street Apartment. The firearm is a Glock pistol, bearing serial number BDAP714 (hereinafter the “Glock pistol”). The Glock pistol was recovered loaded and modified with a conversion device, as explained above, that is commonly known as an “auto sear” or “Glock switch.” This device converted the Glock pistol HARRIS possessed from a semiautomatic firearm into an automatic firearm, meaning that the Glock pistol could automatically shoot more than one shot by a single function of the trigger allowing the ammunition to shoot, or spray, from the Glock pistol as a machinegun.

14. Below is a photograph of the Glock pistol with the Glock switch attached to it. The Glock switch is circled for reference.



C. HARRIS VIDEOS

15. Based on my training and experience, I know that YouTube, in summary, is a video sharing website that permits users to post videos and allows viewers the ability to watch videos on the internet.

16. On or about January 19, 2024, I viewed two different rap music videos on YouTube; one video was entitled “Death,” and the other video was “Murda Man.” The “Death” video appears to have been posted on YouTube on or about August 10, 2023, and the “Murda Man” video appears to have been posted on or about September 21, 2023.

17. Based upon HARRIS’s Illinois driver’s license photograph and my personal observations and interactions with HARRIS today, the individual in both of the rap music videos on YouTube appears, in my opinion, to be HARRIS.

18. In both the “Murder Man” and “Death” videos, HARRIS makes statements about Glock switches.

19. In “Murder Man,” approximately 15 seconds into the video, HARRIS states, “My Glock [firearm] got a switch [Glock switch] get drenched.”¹

¹ At various points in this Affidavit, I have included in brackets my interpretation of words and phrases used in HARRIS’s music videos. I based my preliminary interpretations on the content and context of the videos, events occurring before or after the videos, my knowledge of the investigation as a whole, and the training and experience of law enforcement officers involved in this investigation. The interpretations of these videos, as indicated above, are preliminary and not final transcripts.

20. Approximately 21 seconds into the video, HARRIS further states, “two switch [Two firearms with Glock switches] in my hand, for my AP two opps [opposition] they dead they hate me.”

21. Approximately 29 seconds into the video, HARRIS further states, “got my shooter with my they gonna spray for me.” Below is a screenshot of HARRIS as shown in the “Murder Man” video:



22. In the “Death” music video, approximately 37 seconds into the video, HARRIS states, “New Glocks [firearms] on us got switches [Glock switches] turn nigga a ghosts.”

23. At approximately one minute and 46 seconds into the “Death” video, HARRIS further states, “these Glocks [firearms] on us switches [Glock switches] ... Up this bitch and spray spray.” Based on my training and experience, when HARRIS

stated that Glock switches “spray spray,” he was indicating that Glock switches allow firearms to “spray” bullets.

24. Below is a screenshot of HARRIS as shown in the “Death” video:



III. CONCLUSION

25. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about January 19, 2024, MAURICE HARRIS knowingly

possessed a machinegun, as it is defined in Title 26, United States Code, Section 5845(b), and in violation of in violation of Title 18, United States Code, Section 922(o)(1).

FURTHER AFFIANT SAYETH NOT.

Derreon McElwee

DERREON MCELWEE

Special Agent

Federal Bureau of Investigation

Sworn to and affirmed by telephone on this 19th day of January, 2024.

Gabriel A. Fuentes

Gabriel A. Fuentes

UNITED STATES MAGISTRATE JUDGE